UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF NEW YORK

JANE DOE,

Plaintiff,

v.

JONATHAN REES, a/k/a GREG ELLIS, a/k/a JONNY REES,

Defendant.

Case No.: 3:23-CV-1352 (TJM/ML)

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the Declaration of Kenneth A. Caruso, Esq., dated August 26, 2024, the exhibits annexed thereto and the accompanying Memorandum of Law, Plaintiff, Jane Doe, will move this Court, at the U.S. Courthouse, 15 Henry Street, Binghamton NY 13901, on a date and at a time to be fixed by the Court, for an order, pursuant to Fed. R. Civ. P. 15(a) and (d), for leave to file an Amended and Supplemental Complaint, and granting such other and further relief as the Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to N.D.N.Y. Local Rule 7.1(a)(2), papers in opposition to this motion must be filed on or before September 16, 2024.

Dated: New York, NY
August 26, 2024

KENNETH CARUSO LAW LLC

By: /s/ Kenneth A. Caruso Kenneth A. Caruso 15 W. 72nd Street New York, NY 10022 Phone: (646) 599-4970

Email: ken.caruso@kennethcarusolaw.com

Attorneys for Plaintiff, Jane Doe